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Pro hac vice applications pending

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

**HAYDEN GATEWAY LLC and
BLOC DISPENSARY LLC,**

Plaintiffs,

v.

**ADVANCED FLOWER
CAPITAL INC. and AFC AGENT
LLC,**

Defendants.

CIVIL ACTION NO. 3:25-CV-02789-ZHQ-JBD

**[PROPOSED] ORDER TO SHOW CAUSE
WITH TEMPORARY RESTRAINTS
TO BE CONVERTED TO A PRELIMINARY
INJUNCTION**

THIS MATTER having come before the Court on the application (the “Application”) of Plaintiffs Hayden Gateway LLC (“Hayden”) and Bloc Dispensary LLC (“Bloc”) (jointly, “Plaintiffs”), by and through counsel, DYNAMIS LLP, for entry of a an Order to Show Cause with Temporary Restraints against Defendants Advanced Flower Capital Inc. and AFC Agent LLC

(jointly, “Defendants”), and it appearing to the Court that Plaintiffs have served copies of their Application, Complaint, Memorandum of Law, and all supporting papers upon Defendants; and the Court having considered the supporting papers and arguments of counsel; and other good cause having been shown:

IT IS on this _____ day of _____, 2025, **ORDERED** that Plaintiffs’ Application for an Order to Show Cause With Temporary Restraints is **GRANTED** in full, and Defendants are hereby temporarily restrained and enjoined from seizing any of Plaintiffs’ assets or cash (beyond the permitted scheduled cash sweeps), and to cease any other attempted remedy for any alleged default; and

IT IS FURTHER ORDERED that on the _____ day of _____, 2025, at _____ (the “Return Date”), Defendants shall appear before the Honorable Zahid N. Quraishi, United States District Judge, United States District Court for the District of New Jersey, Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, NJ 08608, Courtroom 4W, and show cause why the Court should not issue an Order converting the temporary restraining order to a preliminary injunction enjoining Defendants from seizing any of Plaintiffs’ assets or cash (beyond the permitted scheduled cash sweeps), and to cease any other attempted remedy for any alleged default; and

IT IS FURTHER ORDERED that Defendants shall file and serve any written response to this Order to Show Cause by the ____ day of _____, 2025; and

IT IS FURTHER ORDERED that Plaintiffs shall file and serve any written reply to Defendants’ opposition to this Order to Show Cause by the ____ day of _____, 2025.

SO ORDERED:

THE HONORABLE ZAHID N. QURAISHI, U.S.D.J.